

REMARKS

Applicants thank the Examiner for the thorough consideration given the present application.

As required by the Office Action, attached is a revised formal drawing for FIG. 4, wherein reference numeral "46" and the arrow associated therewith are deleted.

As also required by the Office Action, the specification is amended to include a detailed description of FIG. 5.

Claims 2, 8, and 10 are amended to address the informalities noted on page 3 of the Office Action. Claim 13 is amended to correct a misspelling. Claims 1, 3, 4, 11, 12, and 16 are amended to define their contribution to the art with greater particularity.

Claims 18-26 are added. Claim 18 is the same as claim 10, indicated to contain allowable subject matter, but depends on claim 1. Added claim 19 includes all the subject matter of original claim 10, i.e., claim 19 does not include the amendments to claim 1. Claim 20 includes all the subject matter of claim 19 (i.e., including the subject matter of allowable claim 10), except that claim 20 does not require the interface of claim 19.

New claims 21 and 23, respectively dependent on independent claims 1 and 16, distinguish over the art of record by requiring the priority that indicates how far to compress an information record to be based on expected use of the information record.

New claims 22 and 24, respectively dependent on claims 21 and 23, define over the art of record by requiring the controller to compress the particular information record by a variable amount on the basis of the intended use of the particular record.

New claims 25 and 26, respectively dependent on independent claims 1 and 16, distinguish over the art of record by requiring the controller to be adapted to compress the particular information record by a variable amount on the basis of the priority rating of the particular information record.

Applicants traverse the rejection of claims 1, 7, 13 and 14 as being anticipated by Torres (U.S. 6,564,282). Applicants cannot agree that Torres includes the original claim 1, requirement for a controller "adapted to select which information records to compress and how far to compress them on the basis of the priority ratings of said information records." The reliance for this feature on Torres' disclosure at column 5, line 55, through column 6, line 31, is misplaced. Torres uses the term "priority" to refer to the temporal sequence by which files are compressed.

Torres indicates that a user may notice that certain files still being carried in the camera have actually been copied/archived. Torres says such a user could tag these files when viewed in a review mode, such as through a menu selection item, as highest priority candidates for further compression.

Conversely, certain files can also be tagged as unavailable for further compression. In such an instance, a **first** check is required for files tagged with the priority to perform additional compression of these files **first**, then a check to determine whether the marked file is unavailable for further compression. Torres is also deficient because it provides a predetermined level of compression. See column 5, line 61, and column 6, line 3.

In contrast, original claim 1 indicated that the information records are compressed and that the controller is adapted to determine how far to compress the records. As amended, claim 1 distinguishes even more particularly over Torres by requiring the controller to select which information records to compress and how far to compress a particular information record on the basis of its priority rating. Torres does not appear to have a disclosure of such individualized compression.

Claims 7, 13, and 14, as well as claim 15 (rejected as being obvious as result of Torres), are allowable for the same reason advanced for claim 1, upon which they depend.

Applicants traverse the rejection of claims 2 and 8 as being obvious as result of Torres in view of Imai et al. (JP 09-128276). This rejection is improper because Torres does not anticipate claim 1, upon which claims 2 and 8 depend. In addition, Applicants cannot agree that one of ordinary skill the

art would have modified Torres to delete image data. The purpose of the Torres reference is to "increase storage capacity." In other words, Torres desires to increase the number of images that can be captured. Torres is not interested in simply exchanging one new image for one or more images.

In the Torres device, deletion conflicts with the user's intention to capture an image. Further compression preserves all of the images, but the quality of the preserved images is inferior. Hence, it is very clear that all images should be preserved in the Torres device. Consequently, one of ordinary skill in the art would not be motivated to modify the Torres device to delete image data.

Applicants traverse the rejection of claim 3 as being unpatentable over Torres in view of Hosoe et al. (U.S. 6,674,468). The rejection is improper because Torres does not anticipate claim 1, upon which claim 3 depends. Further, as originally submitted, claim 3 required the priority rating to include a predefined permissible compression level for an information record. As amended, claim 3 is more specifically stated to include the maximum permissible compression level for each information record.

The reliance on Hosoe et al. for this feature is misplaced. Hosoe merely discloses a single user-selectable level that defines a compression level used for all subsequently captured images until a user selects another level. The user-selectable

level in Hosoe cannot be applied to stored images; it can only be applied to the next file to be stored. In Hosoe, there is only one setting for each file, rather than a separate setting for each file. Further, the Hosoe setting defines the exact compression level used to store the next file, rather than a maximum level up to which one or more future operations can further compress the file to free memory. Consequently, Hosoe does not include the features of claim 3, particularly as amended.

Applicants traverse the rejection of claims 4-6 as being obvious over Torres, Hosoe, and Makishima et al. (U.S. 6,549,307). Claim 4 depends on claim 3, while claims 5 and 6 depend on claim 4. As already discussed, the rejection of claim 3 is improper, and Makishima does not cure the deficiencies in rejection of claim 3. Accordingly, the rejection of claims 4-6 is wrong.

Moreover, Makishima is incompatible with Torres and Hosoe. Hosoe does not allow a file to be stored initially at a lesser compression level with an associated stored record of the priority file such that the file can be recompressed one or more times up to the maximum level as the need arises. Makishima discloses only one compression step. The initial compression is the highest compression level permissible for the purpose. Makishima has no disclosure of associating the purpose of the priority with the file so the priority can be modified later.

Use of functional priorities to define maximum future compression levels of the individual stored records is not obvious, because Hosoe and Makishima describe single compression levels that are applied once to all of the subsequent files to be compressed.

Applicants traverse the rejection of claim 9 as being obvious as result of Torres and Oie (U.S. 6,188,431). Claim 9 depends on claim 1 and has been improperly rejected on Torres. Oie obviously does not cure the previously discussed deficiencies of Torres with regard to claim 1. Because claim 9 depends on claim 1 and includes all the limitations of claim 1, claim 9 is allowable.

Applicants also traverse the rejection of claims 16 and 17 as being obvious as result of Torres and Oie. Independent claim 16, upon which claim 17 depends, distinguishes over Torres by requiring a controller adapted to select which information records to compress and how far to compress a particular information record on the basis of its priority rating. In this regard, see the prior discussion in connection with claim 1 of why these limitations are not disclosed by Torres. Oie obviously does not cure this deficiency in the Torres reference vis-à-vis claim 16.

The Office Action is also incorrect with regard to claim 17, which requires the controller to calculate a priority rating according to predetermine criteria. As pointed out in the

Office Action, Torres discloses a user setting a priority rating. The assertion in the Office Action that "CPU 344 would have to do some type of calculation in order to associate the tag with the image" is without foundation and is contrary to a user setting a priority rating.

Applicants traverse the rejection of claim 11 as being obvious as result of Torres in view of Oie and Hosoe. Claim 11 includes the same limitations as claim 3, but depends on claim 9. As such, claim 11 is allowable for the same reasons advanced for claim 3.

Applicants traverse the rejection of claim 12 as being unpatentable over Torres in view Oie and further in view of Hosoe and Makishima. Claim 12 includes the same limitations as claim 4, but depends on claim 11. As such, claim 12 is allowable for same reasons advanced for claim 4.

In view of the foregoing amendments and remarks, favorable reconsideration and allowance are respectfully requested and deemed in order.

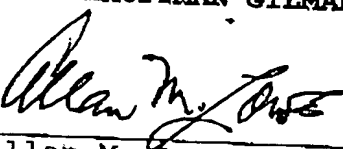
To the extent necessary, Applicants hereby requests any required extension of time not otherwise requested and hereby authorizes the Commissioner to charge any required fees not otherwise provided for, including application processing,

extension of time, and extra claims fees, to Deposit Account No.
08-2025.

Respectfully submitted,

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